

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

SIERRA CLUB,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:11-cv-00071
v.	)	Hon. Paul L. Maloney
	)	
CITY OF HOLLAND and HOLLAND	)	
BOARD OF PUBLIC WORKS,	)	
	)	
Defendants.	)	

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DECLARATION OF DAVID C. BENDER IN SUPPORT OF PLAINTIFF'S  
SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING  
DEFENDANTS' LIABILITY FOR OPACITY VIOLATIONS

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**EXHIBIT F:**

Relevant Portions of Defendants'  
Quarterly Opacity Excess Emissions Reports (2009)



**Holland  
Board  
of Public  
Works**

625 Hastings Avenue  
Holland, MI 49423

www.hollandbpw.com

Telephone  
(616) 355-1520

Facsimile  
(616) 355-1550

April 2, 2009

Certified Mail - Return Receipt Requested

Mr. Steve LaChance  
Michigan Department of Environmental Quality  
Air Quality Division  
State Office Building  
350 Ottawa NW  
Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 1st quarter of 2009.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

A handwritten signature in black ink, appearing to read "Judy N. Visscher", is written below the word "Sincerely,".

Judy N. Visscher  
Environmental Regulatory Specialist

copy to: Ms. Bonnie Bush, USEPA-Region V (*Summary Report only*)  
Mr. Jon M. Wilford, MDEQ-CSU, Lansing

A  
Community  
Owned  
Utility

Electricity

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Water

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Waste  
Treatment



COHOP00000485



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION**

*Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.*

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name HBPW James DeYoung Generation Station & WWTP County Ottawa  
Source Address 64 Pine Avenue & 42 South River Avenue City Holland  
AQD Source ID (SRN) B2357 ROP No. MI-ROP-B2357-2006a ROP Section No. 01 & 02

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☒ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 1/1/09 To 3/31/09

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Quarterly Excess Emissions and Monitor Downtime Report

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete.

David G. Koster Operations Director 616-355-1562  
Name of Responsible Official (print or type) Title Phone Number

[Signature]  
Signature of Responsible Official

4/2/09  
Date

\* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

COHOP00000486

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 01/01/09 – 3/31/09Company: Holland Board of Public Works, James De Young Gen. Station Unit Description: #3 BoilerEmission Limit: 20% Total Source Operating Time: 113,460 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720EMISSION DATA SUMMARY<sup>1</sup>

1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CEM SYSTEM SUMMARY<sup>1</sup>

1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (semi-annual preventive maintenance)	288
e.	Unknown Causes	
2.	Total CEM system downtime	288
3.	(Total CEM system downtime / Total source operating time ) x 100	0.25 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

Judy N. Visscher, Environmental Regulatory Specialist

Date: 04/02/09

COHOP00000487

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 01/01/09 – 03/31/09Company: Holland Board of Public Works, James De Young Gen. Station Unit Description: #4 BoilerEmission Limit: 20% Total Source Operating Time: 63,252 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

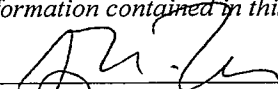
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	24
c.	Control Equipment Problems	
d.	Process Problems:	
e.	Other Known Causes: maintenance performed on precipitator fields	138
f.	Unknown Causes:	
2.	Total duration of EE	162
3.	(Total duration of EE / Total source operating time ) x 100	0.26 %

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy N. Visscher, Environmental Regulatory Specialist
Date: 04/02/09

COHOP00000488

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 01/01/09 – 03/31/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #5 BoilerEmission Limit: 20% Total Source Operating Time: 72,378 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

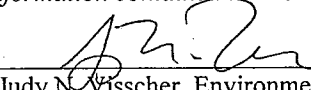
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00%

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
Judy N. Visscher, Environmental Regulatory SpecialistDate: 04/02/09

COHOP00000489



**Holland  
Board  
of Public  
Works**

625 Hastings Avenue  
Holland, MI 49423

www.hollandbpw.com

Telephone  
(616) 355-1520

Facsimile  
(616) 355-1550

July 27, 2009

Certified Mail - Return Receipt Requested

Mr. Steve LaChance  
Michigan Department of Environmental Quality  
Air Quality Division  
State Office Building  
350 Ottawa NW  
Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 2nd quarter of 2009.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher  
Environmental Regulatory Specialist

copy to: Ms. Bonnie Bush, USEPA-Region V (*Summary Report only*)  
Mr. Jon M. Wilford, MDEQ-CSU, Lansing

A  
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COHOP00000657



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION**

*Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.*

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name HBPW James DeYoung Generation Station & WWTP County Ottawa  
Source Address 64 Pine Avenue & 42 South River Avenue City Holland  
AQD Source ID (SRN) B2357 ROP No. MI-ROP-B2357-2006a ROP Section No. 01 & 02

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☒ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 4/1/09 To 6/30/09

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Quarterly Excess Emissions and Monitor Downtime Report

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

David G. Koster  
Name of Responsible Official (print or type)

Operations Director  
Title

616-355-1562  
Phone Number

[Signature]  
Signature of Responsible Official

7/17/2009  
Date

\* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

COHOP00000658



## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 04/01/09 – 06/30/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #3 BoilerEmission Limit: 20% Total Source Operating Time: 0 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

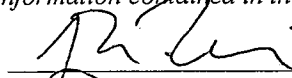
CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy N. Visscher, Environmental Regulatory Specialist
Date: 07/24/09

COHOP00000659

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 04/01/09 – 06/30/09

Company: Holland Board of Public Works, James De Young Gen. Station Unit Description: #4 Boiler

Emission Limit: 20% Total Source Operating Time: 102,408 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

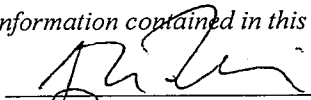
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	12
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems:	
e.	Other Known Causes: maintenance performed on precipitator fields	
f.	Unknown Causes:	
2.	Total duration of EE	12
3.	(Total duration of EE / Total source operating time ) x 100	0.01%

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	18
d.	Other Known Causes (annual bench calibration of monitor)	786
e.	Unknown Causes	
2.	Total CEM system downtime	804
3.	(Total CEM system downtime / Total source operating time ) x 100	0.79 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

*I certify that the information contained in this report is true, accurate, and complete.*

Signature:

  
Judy N. Visscher, Environmental Regulatory Specialist

Date: 07/24/09

COHOP00000660

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 04/01/09 – 06/30/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #5 BoilerEmission Limit: 20% Total Source Operating Time: 46,050 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

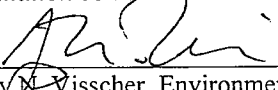
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00%

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy M. Visscher, Environmental Regulatory Specialist
Date: 07/24/09

COHOP00000661



**Holland  
Board  
of Public  
Works**

625 Hastings Avenue  
Holland, MI 49423

www.hollandbpw.com

Telephone  
(616) 355-1520

Facsimile  
(616) 355-1550

October 12, 2009

Certified Mail - Return Receipt Requested

Mr. Steve LaChance  
Michigan Department of Environmental Quality  
Air Quality Division  
State Office Building  
350 Ottawa NW  
Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 3rd quarter of 2009.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher  
Environmental Regulatory Specialist

copy to: Ms. Bonnie Bush, USEPA-Region V (*Summary Report only*)  
Mr. Jon M. Wilford, MDEQ-CSU, Lansing

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MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION**

*Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.*

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name HBPW James DeYoung Generation Station & WWTP County Ottawa  
Source Address 64 Pine Avenue & 42 South River Avenue City Holland  
AQD Source ID (SRN) B2357 ROP No. MI-ROP-B2357-2006a ROP Section No. 01 & 02

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 07/01/09 To 9/30/09

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Quarterly Excess Emissions and Monitor Downtime Report

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

David G. Koster  
Name of Responsible Official (print or type)

Operations Director  
Title

616-355-1562  
Phone Number

Signature of Responsible Official

10/15/2009  
Date

\* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

COHOP00000312

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 07/01/09 – 09/30/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #3 BoilerEmission Limit: 20% Total Source Operating Time: 66,768 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

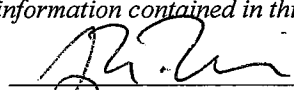
CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (semi-annual preventive maintenance performed on monitor)	174
e.	Unknown Causes	
2.	Total CEM system downtime	174
3.	(Total CEM system downtime / Total source operating time ) x 100	0.26 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy N. Visscher, Environmental Regulatory Specialist
Date: 10/12/09

COHOP00000313

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 07/01/09 – 09/30/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #4 BoilerEmission Limit: 20% Total Source Operating Time: 131,952 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

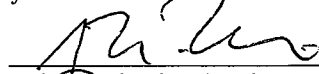
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems: ash hauling trouble	12
e.	Other Known Causes:	
f.	Unknown Causes:	
2.	Total duration of EE	12
3.	(Total duration of EE / Total source operating time ) x 100	0.01%

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (semi-annual preventive maintenance performed on monitor)	210
e.	Unknown Causes	
2.	Total CEM system downtime	210
3.	(Total CEM system downtime / Total source operating time ) x 100	0.16 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy N. Visscher, Environmental Regulatory Specialist
Date: 10/12/09

COHOP00000314

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 07/01/09 – 09/30/09

Company: Holland Board of Public Works, James De Young Gen. Station Unit Description: #5 Boiler

Emission Limit: 20% Total Source Operating Time: 132,480 minutes

Monitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

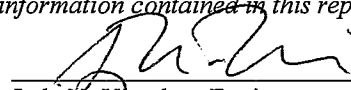
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems (coal feeder problems caused boiler upset)	12
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	12
3.	(Total duration of EE / Total source operating time ) x 100	0.01 %

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (performed semi-annual preventive maintenance on monitor)	228
e.	Unknown Causes	
2.	Total CEM system downtime	228
3.	(Total CEM system downtime / Total source operating time ) x 100	0.17%

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
Judy N. Visscher, Environmental Regulatory Specialist

Date: 10/12/09

COHOP00000315





**Holland  
Board  
of Public  
Works**

625 Hastings Avenue  
Holland, MI 49423

www.hollandbpw.com

Telephone  
(616) 355-1520

Facsimile  
(616) 355-1550

January 11, 2010

Certified Mail - Return Receipt Requested

Mr. Steve LaChance  
Michigan Department of Environmental Quality  
Air Quality Division  
State Office Building  
350 Ottawa NW  
Grand Rapids, MI 49503

Dear Mr. LaChance:

Attached are the Excess Emissions Summary Reports and Detail Reports for Units 3, 4, and 5 of the James De Young Generating Station for the 4<sup>th</sup> quarter of 2009.

Per my phone call of today's date, some monitor readings on the Detail Reports are not included in the EE Summary Reports, as they occurred as the only 6-min period that hour above 20% but not more than 27%.

If you have any questions, please do not hesitate to call me at 616-355-1210.

Sincerely,

Judy N. Visscher  
Environmental Regulatory Specialist

A  
Community  
Owned  
Utility

copy to: Ms. Bonnie Bush, USEPA-Region V (*Summary Report only*)  
Mr. Jon M. Wilford, MDEQ-CSU, Lansing

Electricity

•

Water

•

Waste  
Treatment



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HOLLAND BPW  
FILE COPY

COHOP00000421



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION**

*Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.*

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name HBPW James DeYoung Generation Station & WWTP County Ottawa

Source Address 64 Pine Avenue & 42 South River Avenue City Holland

AQD Source ID (SRN) B2357 ROP No. MI-ROP-B2357-2006a ROP Section No. .01 & .02

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 10/1/09 To 12/31/09

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Quarterly Excess Emissions and Monitor Downtime report

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

David G. Koster Operations Director 616-355-1562  
Name of Responsible Official (print or type) Title Phone Number

Signature of Responsible Official

1/12/2010  
Date

\* Photocopy this form as needed.

EQP 5736 (Rev 11-04)

COHOP00000422

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 10/01/09 – 12/31/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #3 BoilerEmission Limit: 20% Total Source Operating Time: 71,850 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600720

EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

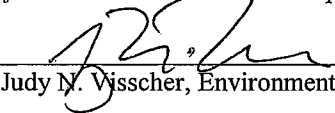
CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction (transceiver blower motor replaced)	36
b.	Non-Monitor Equipment	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	36
3.	(Total CEM system downtime / Total source operating time ) x 100	0.05 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

Comments

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy N. Visscher, Environmental Regulatory Specialist
Date: 1/11/10

COHOP00000423

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 10/01/09 – 12/31/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #4 BoilerEmission Limit: 20% Total Source Operating Time: 102,606 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600721

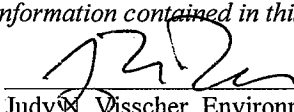
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems: fine tuning new precipitator equipment	12
d.	Process Problems: ash hauling trouble	24
e.	Other Known Causes: boiler upset	18
f.	Unknown Causes:	
2.	Total duration of EE	54
3.	(Total duration of EE / Total source operating time ) x 100	0.05%

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes (annual performance audit performed on monitor)	180
e.	Unknown Causes	
2.	Total CEM system downtime	180
3.	(Total CEM system downtime / Total source operating time ) x 100	0.18 %

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
 Judy W. Visscher, Environmental Regulatory Specialist
Date: 1/11/10

COHOP00000424

## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## SUMMARY REPORT

## GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING SYSTEM PERFORMANCE

Pollutant: Opacity Reporting Period: 10/01/09 – 12/31/09Company: Holland Board of Public Works,  
James De Young Gen. Station Unit Description: #5 BoilerEmission Limit: 20% Total Source Operating Time: 37,410 minutesMonitor mfg., model number, and serial number: Teledyne Monitor Labs Inc., LightHawk 560, 5600722

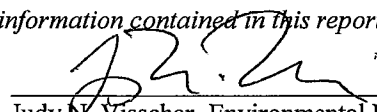
EMISSION DATA SUMMARY <sup>1</sup>		
1.	Duration of excess emissions (EE) in reporting period due to:	
a.	Startup/Shutdown	
b.	Soot Blowing	
c.	Control Equipment Problems	
d.	Process Problems (coal feeder problems caused boiler upset)	
e.	Other Known Causes	
f.	Unknown Causes	
2.	Total duration of EE	0
3.	(Total duration of EE / Total source operating time ) x 100	0.00 %

CEM SYSTEM SUMMARY <sup>1</sup>		
1.	CEM system downtime in reporting period due to:	
a.	Monitor Equipment Malfunction	
b.	Non-Monitor Equipment Malfunctions:	
c.	Quality Assurance Calibration (extra calibrations)	
d.	Other Known Causes	
e.	Unknown Causes	
2.	Total CEM system downtime	0
3.	(Total CEM system downtime / Total source operating time ) x 100	0.00%

<sup>1</sup> For opacity, record time in minutes. For gases, record time in hours.

I certify that the information contained in this report is true, accurate, and complete.

Signature:

  
Judy M. Visscher, Environmental Regulatory SpecialistDate: 1/11/10

COHOP00000425